

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) Criminal No. 15-284 (DWF/SER)
)
v.) **MOTION TO SUPPRESS**
) **STATEMENTS, ADMISSIONS, AND**
THOMAS ROBERT PAGE,) **ANSWERS MADE ON JUNE 10, 2010,**
) **JULY 23, 2012, AUGUST 2, 2012, AND**
Defendant.) **SEPTEMBER 5, 2012**

Statements are attributed to Thomas Page on June 10, 2010, July 23, 2012, August 2, 2012, and September 5, 2012. These statements were made in response to questioning by foreign legal officials, under custodial conditions. Accordingly, Mr. Page, through his undersigned attorneys, moves the Court for an order suppressing these statements, admissions and answers.

As grounds for said motion, defendant states:

1. That the statements, admissions or answers made by the defendant were made without the assistance or benefit of counsel in violation of defendant's Fifth Amendment and Sixth Amendment rights under the Constitution of the United States.
2. That the statements, admissions, or answers made by the defendant were not given freely and voluntarily, thereby violating this defendant's rights under the Fourth Amendment and Fifth Amendment to the Constitution of the United States.
3. That the statements, admissions, or answers were the result of interrogation, under circumstances that amount to custody, without the benefit of a valid advice-of-rights process.
4. For such other reasons as may appear upon an oral hearing of this motion.

Dated: January 6, 2016

Respectfully submitted,

s/Andrew H. Mohring

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